

WALIA & WALIA, PLLC

Attorneys at Law
136-40 39th Avenue, Suite #304
Flushing, New York 11354
Phone 718-353-4478
Fax 718-353-4578

March 14, 2023

Via E-mail

Thehalalcompanyny@gmail.com

Re: Patel Et Al. v. Singh Et Al.

Demand letter for Board of Pan King, Inc. to sue Pratik Patel and Lalit Patel

Dear Sirs,

Please note this firm represents Noddy Singh and Arjun Singh ("Shareholders") – a shareholder of the above-referenced corporation, Pan King, Inc.

We demand the Board at it's meeting today grant Noddy Singh and Arjun Singh the right to bring causes of action derivatively in the right and for the benefit of Pan King, Inc. to redress injuries they suffered, and that they continue to suffer, as a direct result of breaches of fiduciary duties owed by Pratik Patel.

Noddy Singh and Arjun Singh have current undisputed shares of Pan King, Inc. amounting to 37.5% each for a total of 75%.

This office has been informed, at a previously held shareholder meeting on April ~~18~~^{* 5} 2021, with respect to violations of the shareholder agreement by Pratik Patel, the majority voted to dissolve, renounce, and or void any shares held by Pratik Patel on behalf of Pan King, Inc. *As Noddy
Arjun*

Pratik Patel did have an interest in Pan King constituting 25% of the shares of the company, and he had certain duties and obligations as a shareholder which he breached.

As such, demand is made for Pan King, Inc. to sue Pratik Patel and Lalit Patel for breaches of said fiduciary duty for among other things violating the shareholder agreement, fraud and conversion.

Noddy Singh and Arjun Singh will in the right and for the benefit of Pan King, Inc. bring suit to redress injuries they suffered, and that they continue to suffer, as a direct result of breaches of fiduciary duties owed by Pratik Patel.

Noddy Singh and Arjun Singh are shareholders of Pan King, Inc. and will adequately and fairly

WALIA & WALIA, PLLC

Attorneys at Law
136-40 39th Avenue, Suite #304
Flushing, New York 11354
Phone 718-353-4478
Fax 718-353-4578

represent the interests of Pan King, Inc. in enforcing and prosecuting their rights.

Demand Pursuant to N.Y. Bus. Corp. Law § 624 and Common Law Response Within Five Business Days is Required.

Furthermore This letter constitutes a demand pursuant to Section 624 of the N.Y. Business Corporation Law ("Section 624") and New York Common Law to inspect and copy certain books and records of the Pan King Inc. ("Corporation"), as specified below for the purposes set forth below (the "Demand"). Pursuant to Section 624, and Common Law, Shareholder hereby demands the Corporation to make available the following books and records available for inspection and copying within five (5) business days of your receipt of this Demand. The demanded inspection is for all books and records within the Corporation's possession, custody, and control for the period of January 1, 2017 through the present (the "Relevant Period"), unless otherwise indicated.

All bank statements. 2. All leases. 3. All books and records dated or created during the Relevant Period. Please note, for purposes of the Demand, books and records as used herein is construed as broadly as possible under the Uniform Rules for New York State Trial Courts, Section 624 and New York common law and includes, without limitation, any and all correspondence concerning the demanded categories, whether sent via mail: facsimile, electronic communication, or otherwise. In addition, books and records is construed to include "Board Materials", which as used herein means all documents concerning, relating to, provided at, discussed at, prepared or disseminated in connection with any meeting of the Company's Board of Directors (the "Board,") or any regular or specially created committee thereof: including all presentations, board packages, recordings, agendas, summaries, memoranda, transcripts, notes, minutes of meetings, drafts of minutes of meetings, documents such as exhibits or presentations distributed at meetings, summaries of meetings. Or resolutions.

The purpose for the Demand is to investigate potential wrongdoing, mismanagement and breaches of fiduciary duty by the members of Corporation, specifically Pratik Patel, in connection with the events, circumstances, and transactions described above. Please contact me to make arrangements for the review of the demanded books and records: Walia & Walia, PLLC 136-40 39th Avenue suite #304, Flushing, New York 11354. Ph#718-353-4478. Email at Waliabob@yahoo.com. In the event that the Corporation does not respond to this letter or fails to permit inspection and copying of the demanded documents within five business days from the receipt of the demand, we will seek appropriate relief to the fullest extent permitted under the law

WALIA & WALIA, PLLC

Attorneys at Law
136-40 39th Avenue, Suite #304
Flushing, New York 11354
Phone 718-353-4478
Fax 718-353-4578

Sincerely,



BOBBY WALIA

WALIA & WALIA, PLLC
Attorneys for the Defendants
Noddy Singh & Arjun Singh

**MINUTES OF THE
SPECIAL MEETING
DIRECTORS
OF
PANKING INC**

Pursuant to notice (a copy of which is attached), a special meeting of the Directors of the above corporation was held on March 14, 2023 at 3:00 PM at the corporation's place of business.

The purpose of the meeting: Discuss past dues, losses, Void shareholder Pratik Patel's 25% shares due to breach of contract, Counter claims against defaulted shareholder Pratik Patel, Add few other online platform.

I. QUORUM. A quorum was declared present based on the presence of the following Directors:

- Director: Arjun Singh
- Director: Noddy Singh

II. GUESTS. The following guests were present at the meeting:

Gaganroop Kaur
Secretary

The following corporate actions were taken by appropriate motions duly made, seconded, and adopted by the majority vote of the Directors and Shareholders entitled to vote (unless a higher voting approval is stated).

III. REVISE/APPROVE PREVIOUS MINUTES. The minutes of the April 05, 2021 meeting were approved.

IV. ELECTION OF CHAIRPERSON AND SECRETARY. Noddy Singh was appointed chairperson of the meeting, and Gaganroop Kaur was appointed as secretary to prepare a record of the proceedings.

V. ELECTION OF OFFICERS. The following Officers were elected:

Name: Noddy Singh
Office: President
Address: 5 Mineola Ave
Hicksville, New York 11801

Name: Arjun Singh
Office: Treasurer
Address: 48 Genesee St
Hicksville, New York 11801

VI. REPORTS.

- Report by Noddy Singh:
Shareholder agreement, Past due and losses and SBA loan responsibility.

VII. ADOPTION OF DOCUMENTS/PLANS.

The attached New Virtual kitchens were introduced Mr. Gyro, Falafel Factory and Hippo Burger to PANKING's online platform to increase revenue and be able to pay SBA loan which Arjun Singh and Noddy Singh are personally liable for, adopted by a majority vote of the Directors and Shareholders.

VIII. APPROVAL OF ACTIONS SECTION. The actions and undertakings of the Directors, Officers, Employees, and Agents of the corporation were approved with respect to:

- All actions subsequent to the last meeting of the Shareholders.
- Compensation paid to the Officers during the past year.
- Transactions between the corporation and related entities, including the following:

Pratik Patel breached an agreement whereby he said he would work for the company but suddenly stopped working. As a result of this breach the board has decided unanimously to void his 25% shares in the company. It is also agreed due to Pratik Patel's sudden departure the company incurred losses. On June 9 2020 the company had to take out a loan to cover the losses.

- Transactions between the corporation and its Shareholders and/or Officers.
- New online platforms were added to revive PANKING.
- Defaulted shareholder Pratik Patel's share were voided and he is no longer a share holder in PANKING INC

IX. SALARIES. Salaries for Officers and other employees were established as follows:

Name: Arjun Singh
Title: Director and Shareholder
Amount: \$1,000.00 per week

Name: Noddy Singh
Title: Director and Shareholder
Amount: \$1,000.00 per _____

X. AUTHORIZATION OF CORPORATE ACTION. The Officers and Directors were authorized to take all actions and to sign all documents reasonably needed to:

XI. NEXT MEETING. The next meeting of the Board of Directors will be held on March 05, 2024, at 3:00 PM, at 495 S Broadway Hicksville NY 11801 suite #6.

There being no further business, the meeting was duly adjourned.

These Minutes are certified by PANKING INC's Director and Shareholder.

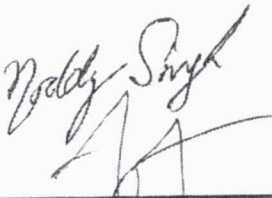
XIII. AUTHORIZATION OF CORPORATE ACTION. The Officers and Directors were authorized to take all actions and to sign all documents reasonably needed to:

- Enter into arrangements for the lease of Ghost kitchen rental agreement A copy of the lease is attached.
- Purchase Ghost kitchen rental agreement..

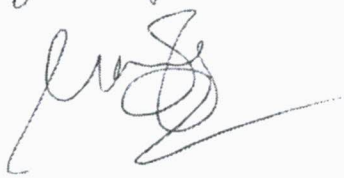
XIV. NEXT MEETING. The next meeting of the Board of Directors and Shareholders will be held on March 05, 2024, at 3:00 PM, at 495 S Broadway Hicksville NY 11801 Suite # 6.

There being no further business, the meeting was duly adjourned.

These Minutes are certified by PANKING INC's Director and Shareholder.

 3/14/23
By: _____
Noddy Singh & Arjun Singh
Director and Shareholder

Date: 3/14/23

Gaganroop Kaur 03/14/23


**MINUTES OF THE
ANNUAL MEETING
SHAREHOLDERS
OF
PANKING INC**

Pursuant to notice (a copy of which is attached), an annual meeting of the Shareholders of the above corporation was held on April 05, 2021 at 3:30 PM at 1610 Old Country Rd Westbury, New York.

The purpose of the meeting: Discuss past dues, commitment towards PANKING INC, share value and ELECT BOARD OF DIRECTORS

I. QUORUM. A quorum was declared present based on the following Shareholders who were present or represented by proxy as follows:

- Shareholder: Arjun Singh
Number of Shares: 37.5
The Shareholder was represented in person.

- Shareholder: Noddy Singh
Number of Shares: 37.5
The Shareholder was represented in person.

II. GUESTS. The following guests were present at the meeting:

Gaganroop Kaur

The following corporate actions were taken by appropriate motions duly made, seconded, and adopted by the majority vote of the Shareholders entitled to vote (unless a higher voting approval is stated).

III. REVISE/APPROVE PREVIOUS MINUTES. The minutes of the _____ meeting were approved.

IV. ELECTION OF CHAIRPERSON AND SECRETARY. Noddy Singh was appointed chairperson of the meeting, and Gaganroop Kaur was appointed as secretary to prepare a record of the proceedings.

V. ELECTION OF DIRECTORS. The following persons were elected as Directors for the terms provided in the bylaws:

Name: Arjun Singh
Term: 5 Years
Address: 48 Genesee st
Hicksville, New York 11801

Name: Noddy Singh
Term: 5 years
Address: 5 Mineola Ave
Hicksville, New York 11801

VI. REPORTS.

- Report by Noddy Singh:
Past Dues, Sba loan and Shareholders agreement.

VII. ADOPTION OF DOCUMENTS/PLANS.

The attached Ghost kitchen rental agreement investment towards online platform business utilizing SBA loan which is personally liable by Arjun Singh and Noddy Singh as shareholders of PANKING INC. adopted by a majority vote of the Shareholders.

VIII. APPROVAL OF ACTIONS SECTION. The actions and undertakings of the Directors, Officers, Employees, and Agents of the corporation were approved with respect to:

- Compensation paid to the Officers during the past year.
- Transactions between the corporation and related entities, including the following:
 - Ghost kitchen rental agreement operating as The halal chicken & rice company previous DBA of PANKING INC from past 4 years and Wing King to rent and operate an online delivery business
- Transactions between the corporation and its Shareholders and/or Officers.
- The purchase of To invest in Ghost kitchen platform and be able to sell on online platform.
- Due to Pratik Patel's Voluntary departure from PANKING INC and default on his contract Panking has incurred losses and has decided to void Pratik Patel's 25% shares by a vote of majority share holders Arjun Singh and Noddy Singh (75%). PANKING INC majority share holders Arjun Singh have also decided to file for counter claims and losses from Pratik Patel due to breach of contract.

IX. SALARIES. Salaries for Officers and other employees were established as follows:

Name: Arjun Singh
Title: Director and
Shareholder
Amount: \$1,000.00 per week

Name: Noddy Singh
Title: Director and
Shareholder
Amount: \$1,000.00 per week

X. CONTRIBUTION TO PROFIT SHARING PLAN. A contribution to the corporation's profit sharing plan was approved in an amount equal to _____.

XI. BORROWING RESOLUTION. The corporation was authorized to borrow such amounts as the Officers deem advisable from SBA.

XII. ESTABLISH BANKING RELATIONSHIP. The Officers are authorized to open accounts with Bank of America.

By: Arjun Singh AS
Noddy Singh and Arjun Singh
Director and Shareholder

Date: 03/14/23

Gaganroop Kaur

GK

03/14/23